

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO

UNITED STATES OF AMERICA,

Plaintiff,

vs.

CR 18-2945 WJ

SUBHANAH WAHHAJ,

Defendants.

UNOPPOSED MOTION TO EXTEND DEADLINES TO FILE RESPONSES ON
DAUBERT MOTIONS

Defendant Subhanah Wahhaj, by and through undersigned counsel Ryan J. Villa and Justine Fox-Young, moves the Court to extend the deadline within which to file her Responses to the Government's Motions to Exclude Testimony [Docs. 759, 760, 761] to June 21, 2023. As grounds Ms. Wahhaj states:

1. On May 1, 2023, Ms. Subhanah Wahhaj filed her Amended Notice of Expert Testimony. *See* Notice [Doc. 735].
2. On May 19, the Government filed its Motions to Exclude Ms. Wahhaj's experts Dr. Chitra Raghavan, Joost Janssen, and Dr. Shuki Cohen. *See* Motions [Doc. 759, 760, 761].
3. The deadline for Ms. Wahhaj's Responses to the Government's Motions was June 2, 2023.
4. On June 6, 2023, the Court granted Ms. Wahhaj's first Unopposed Motion to Extend the Deadline to File Responses, extending the deadline to June 16, 2023. *See* [Doc. 784].
5. The Court set a Daubert hearing on the Motions to begin July 25, 2023. *See* Notice [Doc. 787].
6. Counsel for Defendants need additional time to complete the Responses identified herein.

7. Accordingly, counsel requests the Court extend the deadlines for Responses to June 21, 2023.

8. The extension allows for sufficient time for the United States to file replies prior to the July 25th hearing.

9. The undersigned counsel has contacted counsel for the United States, AUSA Kimberly Brawley, regarding this Motion. Ms. Brawley has indicated that the United States does not oppose this Motion.

WHEREFORE, Counsel for Ms. Subhanah Wahhaj respectfully requests this Court enter an Order extending the time to file the responses as indicated above, to June 21, 2023.

Respectfully submitted,

/s/ Ryan J. Villa

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CERTIFICATE OF SERVICE

I hereby certify that on June 16, 2023, I filed the foregoing electronically through the CM/ECF system, which caused counsel for the United States to be served by electronic means, as more fully reflected on the Notice of Electronic Filing.

/s/ Ryan J. Villa

RYAN J. VILLA